

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
ABINGDON DIVISION

KYMBERLY HOBBS,
ADMINISTRATOR OF THE ESTATE
OF CHARLES JAMES GIVENS,
DECEASED,

)

Case No. 1:23cv00003

)

)

)

**DEFENDANTS ANTHONY KELLY, GREGORY PLUMMER, JOSHUA
JACKSON AND WILLIAM MONTGOMERY’S
MOTION IN LIMINE**

Defendants, Joshua Jackson, Anthony Kelly, Gregory Plummer and William Montgomery, by counsel, move to exclude from opening statements, argument by counsel, and evidence at the trial of this action certain argument and proposed evidence for the reasons stated in the attached memorandum in support.

WHEREFORE, the Court should grant the motion in limine.

ANTHONY RAYMOND KELLY
GREGORY SCOTT PLUMMER
JOSHUA RAY JACKSON
WILLIAM ZACHARY
MONTGOMERY

By Counsel

Cameron S. Bell
VSB No. 47685
PENN, STUART & ESKRIDGE
P.O. Box 2288
Abingdon, Virginia 24212
Telephone: 276/628-5151
Facsimile: 276/628-5621
cbell@pennstuart.com

Timothy W. McAfee
Virginia State Bar Number: 21779
McAfee Law Firm, PLLC
P.O. Box 610
408 Wood Avenue
Big Stone Gap, VA 24219
Telephone: (276) 523-5300
Fax: (540) 301-5777
E-mail: tim@mcafee-law.com

By /s/ Cameron S. Bell
Cameron S. Bell

Counsel for Defendants Kelly, Plummer, Jackson and Montgomery

CERTIFICATE OF SERVICE

I hereby certify that, on March 20, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record.

/s/ Cameron S. Bell

Cameron S. Bell